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March 6, 2025

VIA ECF

Honorable Cheryl L. Pollak **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: Renata Kociubinski et al v. NYC Health and Hospital Corp.,

> > 22 Civ. 2865 (ENV)(CLP)

Dear Judge Pollak:

I write on behalf of Defendant to respectfully request an adjournment of the next settlement conference from March 13, 2025 to April 28, 2025 and of the date for Defendant to serve its settlement response from March 6, 2025 to April 21, 2025. No other deadlines are impacted by this request. Plaintiff consents to this request, subject to Defendant agreeing to provide Plaintiffs' counsel with any developments regarding a settlement counteroffer as well as the obtainment of settlement authority, on a bi-weekly basis.

This adjournment is needed because our Office continues to confer internally to formulate a counteroffer and because I have a heavy caseload, including active matters in state and federal court. Accordingly, I respectfully ask that the Court grant the request made herein.

I thank the Court for its consideration of this request.

Respectfully submitted, /s/Sabrina T. Smith **Assistant Corporation Counsel**

cc: Jason Mizrahi, Attorney for Plaintiff